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U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

Tom L. Lewis
Lewis & Slovak, P.C.
P. O. Box 2325
Great Falls, MT 59403
(406) 761-5595

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W.R. GRACE & CO., <u>et al</u>)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
Debtors.)	
)	Claim No. 00004712
)	
)	

**RESPONSE TO DEBTORS' SECOND OMNIBUS
OBJECTION TO CLAIMS (NON-SUBSTANTIVE)**

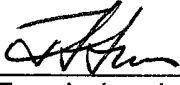
On behalf of claimant, George James Bauer (Claim No. 00004712), his attorney, Tom L. Lewis of Lewis & Slovak, P.C., objects to Debtors' Second Omnibus Objection to Claims (Non-Substantive), dated July 21, 2003, and received August 7, 2003, on the basis of improper notice and further responds as follows:

1. Claimant's claim is with respect to asbestos contamination from a Grace product in or on the property.
2. Claimant's claim is based upon the findings of the U.S. Environmental Protection Agency in its Administrative Record and supplement, test results, and other documentation, as well as information obtained from other sources, including but not limited to local and national news reports, articles and meetings.
3. Claimant consented to the production and release of supporting documentation, in the possession of the U.S. Environmental Protection Agency, to Grace and Grace's representatives at the time of submission of claim in March, 2003.
4. Claimant has attached supporting documentation, which was not available at the time the proof of claim was filed.

**RESPONSE TO DEBTORS' SECOND OMNIBUS
OBJECTION TO CLAIMS (NON-SUBSTANTIVE) - 1**

Respectfully submitted this 8th day of August, 2003.

Lewis & Slovak, P.C.

By: 

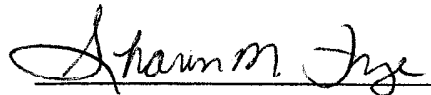
Tom L. Lewis
P.O. Box 2325
Great Falls, MT 59403
(Attorneys for Claimant)

CERTIFICATE OF SERVICE

I hereby certify that a true and legible copy of the foregoing Response to Debtors' Second Omnibus Objection to Claims (Non-Substantive) was served on the 8th day of August, 2003, by fax and by first class mail, upon the following:

James W. Kapp III, Janet S. Baer and Christian J. Lane
Kirkland & Ellis, LLP
200 East Randolph Drive
Chicago, IL 60601

Scott E. McFarland
Pachulski, Stang, Ziehl, Young, Jones & Weintraub, P.C.
919 North Market Street 16th Floor
Wilmington, DE 19801



Phase 1 Background IFF No. 00215 15019/15/02

X Soil samples collected (Date: _____)
 • No CSS Soil Samples Collected
 to do

LIBBY ASBESTOS PROJECT
Contaminant Screening Study

Primary Structure and Property Assessment Supplemental Information Field Form (SIFF)

Field Logbook No.: 100145 Page No.: 41 Site Visit Date: 10/15/02
 Address: 203 E. Spruce St. Structure Description: House
 Occupant: George Bauer Phone Number: 293-1426
 Owner (if different than occupant): N/A Phone Number: N/A
 Sampling Team: Mike Coffey CAM, Shawn Oliveira CAM
 Field Form Check Completed by (100% of forms): WAF
 Screening Field Check Completed by (2% of forms): _____

Data Item	Value	Notes
INDOOR ASSESSMENT		
Vermiculite Insulation Past or Present	Attic: Yes <u>Yes</u> No NA Unknown Walls: Yes <u>Yes</u> No NA Unknown Basement: Yes No <u>NA</u> Unknown Crawl Space: Yes <u>No</u> NA Unknown Other: _____	Visual confirmation of current presence or absence required for attic. • ZAI in attic • ZAI appears to have leaked into wall cavity
OUTDOOR ASSESSMENT		
Libby Amphibole Sources Present	Garden: Yes <u>No</u> NA Yard: Yes <u>No</u> NA Stockpiles: Yes No <u>NA</u> Other: _____	
Proximity to Other Properties with Potential Sources of Libby Amphiboles	Next door Within same block Other: _____ <u>Unknown</u>	

SUPPLEMENTAL INFORMATION FIELD FORM (continued)

Address: 303 E. Spruce St.BD# 002853

Data Item	Value	Notes
EXPOSURE ASSESSMENT		
Type and Frequency of Activity Near Vermiculite Material - Indoor	Frequency: <u>Once a day</u> Once a week Once a month Once a year Not Applicable	Not Applicable applies when no vermiculite is present on the property.
	Duration of Contact: <1 hour <u>1-2 hours</u> 2-4 hours >4 hours Not Applicable	
	Extent of Contact: Heavy <u>Moderate</u> Light Not Applicable	
Type and Frequency of Activity Near Vermiculite Material - Outdoor	Frequency: Once a day Once a week Once a month Once a year <u>Not Applicable</u>	Not Applicable applies when no vermiculite is present on the property.
	Duration of Contact: <1 hour 1-2 hours 2-4 hours >4 hours <u>Not Applicable</u>	
	Extent of Contact: Heavy Moderate Light <u>Not Applicable</u>	

SUPPLEMENTAL INFORMATION FIELD FORM (continued)

Address: 203 E. Spruce St.

BD# 002853

Data Item	Value	Notes
CONTAMINANT SCREENING STUDY ASSESSMENT		
Occupant Information		
Is there any knowledge of former miners, close relative of miners, or any highly exposed persons living or visiting the property?	Yes <u>No</u> Unknown	
Is the resident, past or present, diagnosed with an asbestos related disease?	<u>Yes</u> No Unknown	
Indoor Information		
Does the interior have Zonolite attic insulation?	<u>Yes</u> No Unknown	
Did the interior ever have Zonolite attic insulation?	Yes No Unknown <u>NA</u>	NA applies if attic currently has ZAI.
Are there vermiculite additives in any of the building materials?	Yes <u>No</u> Unknown	
Outdoor Information		
Is there any evidence of primary source materials at or near the property?	Yes <u>No</u> Unknown	
Could this have been tracked indoors or otherwise spread outdoors on the property?	Yes <u>No</u> Unknown	
Overall Assessment		
Are primary source materials present at the property?	<u>Yes</u> No	
Where are primary source materials located?	Inside <u>Outside</u> Both NA	
ADDITIONAL INFORMATION <u>ZAI in attic and has leaked into wall cavity.</u> <u>No outdoor LV observed.</u>		

SUPPLEMENTAL INFORMATION FIELD FORM (continued)

Address: 203 E 45th StBD# 002803

FIELD DIAGRAM OF PRIMARY STRUCTURE

Include approximate dimensions of attic. Use more than one diagram if needed. Completed only if ZAI is present.

Scale: 1/10" = 1 foot

